



*Life...* one mile at a time.

**VIA OVERNIGHT DELIVERY**

February 10, 2011

Ms. Elizabeth A. Kudarauskas  
U.S. EPA Region 1  
5 Post Office Square, Suite 100  
Mail Code: OES-04-2  
Boston, MA 02109-3912

**RE:    Reporting Requirement and Testing Order for Information under  
Section 114 of the Clean Air Act, 42 U.S.C. § 7414(a)**

Dear Ms. Kudarauskas:

Please accept this response by Gulf Oil Limited Partnership to item number 12 of the EPA's Reporting Requirement and Testing Order for Information dated January 13, 2011. (Gulf was granted an extension to the initial 14-day deadline by Thomas Olivier, Senior Enforcement Counsel for EPA, until February 11, 2011.)

As outlined in the EPA's Testing Order, Gulf is required to sample tanks of #6 fuel oil and asphalt for VOC and HAP content at all facilities owned or operated by Gulf in New England. Currently, Gulf owns or operates three bulk storage terminals in New England. The terminals are located in South Portland, Maine; Chelsea, Massachusetts; and New Haven, Connecticut. None of the three Gulf terminals in New England currently store #6 fuel oil or asphalt.

In addition, the EPA's Testing Order requires Gulf to sample any new shipments of #6 fuel oil or asphalt for VOC and HAP content that are received until July 1, 2011. The Gulf terminals in New England are not anticipating receiving and are not currently capable of receiving #6 fuel oil or asphalt through July 1, 2011.

Because Gulf does and will not receive or store #6 fuel oil or asphalt at any of its three New England terminals, items numbers 12 through 15 of the EPA's Reporting Requirement and Testing Order for Information do not apply. Therefore, Gulf will not be providing a sampling protocol for #6 fuel oil or asphalt for those items.

Gulf is in the process of gathering additional information to respond to the EPA's other reporting requirements, and will provide such information within the required 60 days of Gulf's receipt of EPA's request.

Gulf Oil Limited Partnership, 100 Crossing Boulevard, Framingham, MA 01702  
Telephone (508) 270-8300 [www.gulfoil.com](http://www.gulfoil.com)

Ms. Elizabeth A. Kudarauskas  
February 10, 2011  
Page 2 of 2

If you have any questions or require additional information, please contact me via email at [dsmith@gulfoil.com](mailto:dsmith@gulfoil.com) or by telephone at (508) 270-8300.

Sincerely,

**GULF OIL LIMITED PARTNERSHIP**



Donald A. Smith, P.E.  
Environmental Compliance Manager

cc: Susan Studien, Director, OES  
Thomas Olivier, Senior Enforcement Counsel, EPA Region 1  
Paul Escobar, Corporate Counsel, Gulf Oil LP  
Jennifer Hadden, AECOM  
Robert Girard, CT DEP  
Ted Burns, RI DEM  
Kurt Tidd, ME DEP  
Ed Pawlowski, MA DEP Northeast Regional Office  
Saadi Motamedi, MA DEP Western Regional Office